



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

**FILED**

12-10-07  
04:59 PM

Southern California Edison Company's	)	
Application For Approval of Embedded Energy	)	Application 07-01-024
Efficiency Pilot Programs for 2007-2008	)	(Filed January 16, 2007)
Application of Pacific Gas and Electric Company	)	
Seeking Approval of Water-Embedded Energy	)	Application 07-01-026
Savings Pilot Program (U 39 M)	)	(Filed January 16, 2007)
San Diego Gas & Electric Company (U 902-E)	)	
for Approval of Energy & Water Efficiency	)	Application 07-01-029
Partnership and Budget for Years 2007 Through	)	(Filed January 16, 2007)
2008.	)	
Southern California Gas Company (U-904-G) for	)	
Approval of Energy & Water Efficiency	)	Application 07-01-030
Partnership and Budget for Years 2007 Through	)	(Filed January 16, 2007)
2008.	)	

**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON (U 338-E) ON**  
**PROPOSED DECISION**

JENNIFER SHIGEKAWA  
LARRY R. COPE  
R. OLIVIA SAMAD

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-2570  
Facsimile: (626) 302-1904  
E-mail: larry.cope@sce.com

Dated: **December 10, 2007**

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**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON ON PROPOSED  
DECISION**

**I.**

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, Southern California Edison Company ("SCE") hereby submits these reply comments to the comments of The Utility Reform Network ("TURN"), The Natural Resources Defense Council ("NRDC"), California Water Association ("CWA"), San Diego Gas & Electric ("SDG&E"), Southern California Gas Company ("SoCalGas"), and Pacific Gas & Electric (PG&E) on the Draft Order Approving Pilot Water Conservation Programs within the Energy Utilities Energy Efficiency Programs ("Proposed Decision") issued November 15, 2007.

SCE believes it to be inappropriate to create \$4 million in new partnerships as proposed by CWA in their Opening Comments<sup>1</sup>. The Commission reduced pilot program budgets because of non-cost effectiveness and should not unnecessarily expand them at this time. Furthermore, the proposal is not procedurally appropriate during the comment period.

For the multiple reasons cited by NRDC, SCE regards NRDC's proposal to establish a stakeholder advisory group for the evaluation and other studies to be an effective alternative to SCE's and the other utilities' proposal that a revised plan be reviewed in a workshop and written comments. Indeed, such a group, in combination with SCE's recommendation that Energy Division retain a master evaluation contractor to assist with development of the final research plans, may be a superior approach to SCE's original recommendation. SCE also shares NRDC's encouragement to develop the water-energy calculator further. See NRDC Comments at pp. 3-4.

SDG&E, SCG and PG&E request flexibility in the allocation of their process evaluation budgets and also request that funding be restored to 2% of the total pilot cost, rather than limited to 2% of the individual program costs.<sup>2</sup> SCE supports these requests for process evaluation budget changes.

SCE also joins PG&E<sup>3</sup> in seeking flexibility in rolling out the programs and requests that the final decision allow the IOU's to implement programs any time after January 1, 2008, but no later than the third quarter of 2008.

Finally, TURN, SoCalGas and SCE<sup>4</sup> jointly request that the LACSD Water Conservation program include a three-way partnership as proposed by the utilities in SCE's and SoCalGas's<sup>5</sup> Amended Supplemental Testimony on July 11, 2007.

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<sup>1</sup> CWA Comments, p.3.

<sup>2</sup> SDG&E Comments, p. 5 ; SCG Comments, p.8 ; PG&E Comments, p.4.

<sup>3</sup> PG&E Comments, p. 2.;

<sup>4</sup> TURN Comments, p.4.; SCG Comments, p.5.

<sup>5</sup> Amended Supplemental Testimony of Southern California Edison Company Supporting Application for Approval of Embedded Energy Efficiency Water Pilot Programs for 2007-2008, dated July 11, 2007, p. 16; Supplement 2 to Prepared Supplemental Testimony of Mark F. Gaines, dated July 11, 2007, p. 4.

SCE appreciates the efforts of ALJ Weissman, the Commission and Energy Division throughout this proceeding. Taking into account SCE's opening comments and this reply, SCE supports the Proposed Decision and recommends that the Commission adopt the Proposed Decision.

Respectfully submitted,

JENNIFER SHIGEKAWA  
LARRY R. COPE  
R. OLIVIA SAMAD

/s/ LARRY R. COPE

By: Larry R. Cope

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-3477  
Facsimile: (626) 302-1904  
E-mail: larry.cope@sce.com

December 10, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON ON PROPOSED DECISION** on all parties identified on the attached service list(s).

Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this 10<sup>th</sup> day of December, 2007, at Rosemead, California.

/s/ JENNIFER ALDERETE \_\_\_\_\_  
Jennifer Alderete  
Project Analyst  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770

Monday, December 10, 2007

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
A.07-01-024

Nilgun Atamturk  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5303  
SAN FRANCISCO, CA 94102-3214  
A.07-01-024

TIMOTHYA. BLAIR  
THE METROPOLITAN WATER DISTRICT  
700 N. ALAMEDA STREET  
LOS ANGELES, CA 90012  
A.07-01-024

ALISON TEN CATE  
RESOURCE SOLUTIONS GROUP  
711 MAIN STREET  
HALF MOON BAY, CA 94019  
A.07-01-024

AUDREY CHANG  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
A.07-01-024

SHAHID CHAUDHRY  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET  
SACRAMENTO, CA 95814  
A.07-01-024

Cheryl Cox  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4209  
SAN FRANCISCO, CA 94102-3214  
A.07-01-024

RONINE COHEN  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
A.07-01-024

LARRY R. COPE  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON  
PO BOX 800 2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
A.07-01-024

MARTHA DAVIS  
INLAND EMPIRE UTILITIES AGENCY  
6075 KIMBALL AVE.  
CHINO, CA 91710  
A.07-01-024

BRUCE FOSTER  
VICE PRESIDENT  
SOUTHERN CALIFORNIA EDISON COMPANY  
601 VAN NESS AVENUE, STE. 2040  
SAN FRANCISCO, CA 94102  
A.07-01-024

NORMAN J. FURUTA  
ATTORNEY AT LAW  
FEDERAL EXECUTIVE AGENCIES  
1455 MARKET ST., SUITE 1744  
SAN FRANCISCO, CA 94103-1399  
A.07-01-024

DAN GEIS  
THE DOLPHIN GROUP  
925 L STREET, SUITE 800  
SACRAMENTO, CA 95814  
A.07-01-024

HAYLEY GOODSON  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
A.07-01-024

GERRY HAMILTON  
SENIOR ASSOCIATE  
GLOBAL ENERGY PARTNERS, LLC  
3569 MT. DIABLO BLVD., SUITE 200  
LAYFAYETTE, CA 94549  
A.07-01-024

MIKHAIL HARAMATI  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
A.07-01-024

MARCEL HAWIGER  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
A.07-01-024

JACK HAWKS  
CALIFORNIA WATER ASSOCIATION  
601 VAN NESS AVE., SUITE 2047  
SAN FRANCISCO, CA 94102  
A.07-01-024

Monday, December 10, 2007

JEFF HIRSCH  
JAMES J. HIRSCH & ASSOCIATES  
12185 PRESILLA ROAD  
CAMARILLO, CA 93012-9243  
A.07-01-024

REBECCA HONEYFIELD  
NAVIGANT CONSULTING, INC.  
310 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670  
A.07-01-024

LON W. HOUSE PH. D.  
4901 FLYING C RD.  
CAMERON PARK, CA 95682  
A.07-01-024

EDWARD HOWARD  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5110  
SAN FRANCISCO, CA 94102-3214  
A.07-01-024

GARY JENNINGS  
G. JENNINGS & SONS  
201 UNIVERSITY AVENUE, NO 307 F  
Rolling Green Water & Class B-C-D  
BERKELEY, CA 94710  
A.07-01-024

KEN KEATING  
6902 SW 14TH AVENUE  
PORTLAND, OR 97219  
A.07-01-024

Laura L. Krannawitter  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5303  
SAN FRANCISCO, CA 94102-3214  
A.07-01-024

STEVE KROMER  
3110 COLLEGE AVENUE, APT 12  
BERKELEY, CA 94705  
A.07-01-024

JEANNINE LARABEE  
SANTA CLARA VALLEY WATER DISTRICT  
5750 ALMADEN EXPRESSWAY  
SAN JOSE, CA 95118-3614  
A.07-01-024

Diana L. Lee  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4300  
SAN FRANCISCO, CA 94102-3214  
A.07-01-024

JODY S. LONDON  
JODY LONDON CONSULTING  
PO BOX 3629  
OAKLAND, CA 94609  
A.07-01-024

DIANA MAHMUD  
ATTORNEY AT LAW  
THE METROPOLITAN WATER DISTRICT OF  
SOUTH  
PO BOX 54153  
LOS ANGELES, CA 90054-0153  
A.07-01-024

BILL MCDONNELL  
700 N. ALAMEDA STREET  
LOS ANGELES, CA 90012  
A.07-01-024

JIM MEYERS  
SOUTHWEST REGIONAL MANAGER  
NORTH AMERICAN INSULATION MANUF.  
ASSOC.  
7792 SOUTH HARRISON CIRCLE  
CENTENNIAL, CO 80122  
A.07-01-024

BRIAN MICHELSEN  
PROGRAMS SPECIALIST  
SONOMA COUNTY WATER AGENCY  
PO BOX 11628  
SANTA ROSA, CA 95406  
A.07-01-024

CYNTHIA MITCHELL  
ENERGY ECONOMICS, INC.  
530 COLGATE COURT  
RENO, NV 89503  
A.07-01-024

CLYDE MURLEY  
1031 ORDWAY STREET  
ALBANY, CA 94706  
A.07-01-024

JENNA OLSEN  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE N3W  
SAN FRANCISCO, CA 94123  
A.07-01-024

Monday, December 10, 2007

LAURIE PARK  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670-6078  
A.07-01-024

STEVEN D. PATRICK  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA GAS COMPANY  
555 WEST FIFTH STREET GT14E7  
LOS ANGELES, CA 90013-1011  
A.07-01-024

JOHN ROSENBLUM  
900 DORTHEL STREET  
SBASTOPOL, CA 95472  
A.07-01-024

R. OLIVIA SAMAD  
SOUTHERN CALIFORNIA EDISON COMPANY  
PO BOX 800  
ROSEMEAD, CA 91770  
A.07-01-024

DEBORAH S. SHEFLER  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94120  
A.07-01-024

STEVEN S. SHUPE  
DEPUTY COUNTY COUNSEL  
OFFICE OF THE SONOMA COUNTY  
COUNSEL  
575 ADMINISTRATION DRIVE, ROOM 105A  
SANTA ROSA, CA 95403  
A.07-01-024

SAMUEL SIRKIN  
6908 SW 37TH AVENUE  
PORTLAND, OR 97219  
A.07-01-024

GREY STAPLES  
THE MENDOTA GROUP, LLC  
1830 FARO LANE  
SAINT PAUL, MN 55118  
A.07-01-024

JEFF STEPHENSON  
SAN DIEGO COUNTY WATER AUTHORITY  
4677 OVERLAND AVENUE  
SAN DIEGO, CA 92123  
A.07-01-024

PATRICK STONER  
PROGRAM DIRECTOR  
LOCAL GOVERNMENT COMMISSION  
1303 J STREET, SUITE 250  
SACRAMENTO, CA 95814  
A.07-01-024

PATRICIA THOMPSON  
SUMMIT BLUE CONSULTING  
2920 CAMINO DIABLO, SUITE 210  
WALNUT CREEK, CA 94597  
A.07-01-024

EDWARD VINE  
LAWRENCE BERKELEY NATIONAL  
LABORATORY  
BUILDING 90R4000  
BERKELEY, CA 94720  
A.07-01-024

PETER E. VONHAAM  
METRO. WATER DIST. OF SO. CALIF.  
700 N. ALAMEDA STREET, 11TH FLOOR  
LOS ANGELES, CA 90054-0153  
A.07-01-024

DEVRA WANG  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
A.07-01-024

MARTIE L. WAY  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET  
SAN FRANCISCO, CA 94105  
A.07-01-024

Steven A. Weissman  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5107  
SAN FRANCISCO, CA 94102-3214  
A.07-01-024

Sean Wilson  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 3-C  
SAN FRANCISCO, CA 94102-3214  
A.07-01-024

JOSEPHINE WU  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MC B9A  
SAN FRANCISCO, CA 94105  
A.07-01-024



**A.07-01-024 et. al**

Monday, December 10, 2007

JOY C. YAMAGATA  
SAN DIEGO GAS & ELECTRIC/SOCALGAS  
8330 CENTURY PARK COURT  
SAN DIEGO, CA 91910  
A.07-01-024

MRW & ASSOCIATES, INC.  
1814 FRANKLIN STREET, SUITE 720  
OAKLAND, CA 94612  
A.07-01-024